

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

JOHN EWALT, et al.,

Plaintiffs,

v.

GATEHOUSE MEDIA OHIO
HOLDINGS II, INC., d/b/a THE
COLUMBUS DISPATCH, et al.,

Defendants.

Case No. 2:19-cv-4262

Chief Judge Algenon L. Marbley

Magistrate Judge Kimberly A. Jolson

**MOTION OF PLAINTIFFS JOHN EWALT, STEVE WYLIE, AND BONNIE NAVARRE
TO FILE UNREDACTED VERSION OF MEMORANDUM IN OPPOSITION TO
MOTION TO STAY UNDER SEAL**

Pursuant to the Court's Protective Order [R. 37, Amended Protective Order, Page ID # 938-951], Plaintiffs John Ewalt, Steve Wylie, and Bonnie Navarre move for an order granting them leave to file an unredacted version of their *Memorandum in Opposition of Plaintiffs John Ewalt, Steve Wylie, and Bonnie Navarre to Defendant Gatehouse Media Ohio Holdings II, Inc.'s Motion To Stay Discovery* ("Memorandum in Opposition") and Exhibits A-E thereto under seal.

The reasons for this Motion are more fully explained in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ Todd H. Neuman

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MEMORANDUM IN SUPPORT

This case arises from GateHouse's shameless attempt to deprive its customers of the benefits of their bargains by shortening those customers' subscriptions through the issuance of unwanted premium editions and by charging grossly inflated paper statement fees for invoices. The Court, on April 3, 2020, entered the Protective Order, which governs designation and disclosure of confidential documents.

The Plaintiffs' Memorandum in Opposition quotes and attaches documents that have been designated as Confidential. While the Plaintiffs believe that GateHouse has over-designated documents as Confidential, for now, the Plaintiffs are treating these documents as Confidential.

Section 8 of the Protective Order governs the filing of and reference to documents designated as Confidential. When a party cites to documents designated as Confidential in its memorandum, the party "shall file a redacted version of the Filing on the public docket of this Court, shall file a motion for leave to file an unredacted version of the Filing under seal, and shall provide courtesy copies of the unredacted Filing to the Court and counsel for the opposing party." [R. 37, Amended Protective Order at pp. 7-8, Page ID # 944-945.] The Plaintiffs, in accordance with this provision, will be filing a redacted version of their Memorandum in Opposition and Exhibits A-E and will serve the Court and GateHouse with an unredacted version. With this Motion, the Plaintiffs are seeking leave to file an unredacted version of the Memorandum in Opposition and Exhibits A-E under seal.

While the Plaintiffs may later challenge the designation of Exhibits A-E as confidential, at this juncture, the Court should allow the Plaintiffs to file the Memorandum in Opposition and Exhibits A-E under seal.

Respectfully submitted,

/s/ Todd H. Neuman

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon the following parties via the Court's e-filing notification system on August 25, 2021:

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